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Attorney for Plaintiff
Jose Edgar Perez

UNITED STATES DISTRICT COURT
FOR NORTHERN DISTRICT OF CALIFORNIA

JOSE EDGAR PEREZ,

Plaintiff,
vs.

RUMI CONSTRUCTION, a sole proprietorship
of HAMID GHAZANFARI, JANET
FAYZBAKSH, FRAYAR GHAZANFARI,
AMANA ENGINEERING AND
CONSTRUCTION INC., A NASSER
JANDALI, AMERICAN CONTRACTORS
INDEMNITY CO.
Defendants

Defendants

Case No.: C07-02039 PJH

STIPULATION TO CONTINUE INITIAL
CASE MANAGEMENT CONFERENCE &
[PROPOSED] ORDER

Parties, through their counsel, stipulate to continue the Initial Case Management
Conference currently set on October 11, 2007 as follows:

1. Plaintiff filed the Complaint on April 10, 2007.
2. The case was originally assigned to Magistrate Judge Larson, and was recently
reassigned to this Court due to a declination to proceed before a magistrate field by one party.
3. This wage and hour case arose out of Plaintiff's employment with the Defendant
Hamid Ghazanfari doing business as Rumi Construction. While named in this case, Mr.

1 Ghazanfari has filed chapter 13, effectively staying Plaintiff's claim against him. As such, the
2 only claims remain to proceed in this case are the claims against American Contractors
3 Indemnity Co. arising out of the contractor's bond taken out on some public work projects that
4 Plaintiff had worked on, and the claims against Defendant Amana Engineering and Construction
5 Inc. under California Labor Code § 2810 for knowingly contracting subcontractor for insufficient
6 funds on certain projects where Rumi Construction was the subcontractor for Amana
7 Engineering and Construction Inc.

8 4. Given the case posture, parties realize that the claims remaining may not
9 economically warrant the costs in a full-scale litigation, and parties wish to have an opportunity
10 to explore the settlement before case proceeds to discovery.

11 5. As such, parties request that the Initial Case Management Conference be
12 continued for 45 days to November 15, 2007.

13
14 Dated: October 4, 2007

By: /s/ ADAM WANG
Adam Wang
Attorney for Plaintiff

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16
17 Dated: October 4, 2007

By: /s/ Walter Cook
Attorney for Amana Engineering &
Construction Inc. & A Nasser Jandali

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19 Dated: October 4, 2007

By: /s/ Charles Philips
Chares Philips
Attorney for American Contractors
Indemnity Co.

[~~PROPOSED~~] ORDER

IT IS HEREBY ORDERED that the Initial Case Management Conference currently scheduled on October 11, 2007 be continued to November 15, 2007.

IT IS SO ORDERED.

Dated: October 9, 2007

